

FILED

e JUL 23 2020

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

NAWOMI AWOGA;
MARINA OKE, also known as, Marina
Fandohan; and
ASSIBA LEA FANDOHAN

UNDER SEAL

No.

20CR

397

Violations: Title 8, United States Codes
Sections 1324(a)(1)(A)(iii),
1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i);
Title 18, United States Code, Sections
1589(a)(1), 1589(a)(4), 1589(d) and 2

COUNT ONE

JUDGE BLAKEY

MAGISTRATE JUDGE WEISMAN

The SPECIAL MAY 2019 GRAND JURY charges:

1. At times material to this indictment:

a. Benin is a country located in West Africa.

b. In June 2014, Victim A was a 14-year-old Benin citizen and
national.

c. In June 2014, Victim B was a 12-year-old Benin citizen and
national.

d. Defendant NAWOMI AWOGA is the mother of defendants
MARINA OKE (a.k.a. Marina Fandohan) and ASSIBA LEA FANDOHAN.

e. Defendant NAWOMI AWOGA is a citizen of Benin, who resided
at various times with defendants MARINA OKE at Residence A, located in Country
Club Hills, Illinois, and ASSIBA LEA FANDOHAN at Residence B, located in Hazel
Crest, Illinois, in the Northern District of Illinois.

f. A B1/B2 visa generally permits individuals to enter the United States temporarily for purposes of pleasure or tourism. Individuals who enter the United States on these visas are not permitted to work under the terms of the visa. An individual who remains in the United States after expiration of the visa or who works in violation of the terms of the visa is present in the United States in violation of immigration laws.

2. Between in or around June 2014, and continuing until on or about October 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

NAWOMI AWOGA,
MARINA OKE a.k.a. Marina Fandohan, and
ASSIBA LEA FANDOHAN,

defendants herein, conspired to conceal, harbor, and shield from detection, unauthorized aliens as described below.

3. It was part of the conspiracy that, in June 2014, Victim A and Victim B left their families in Benin to live with defendant NAWOMI AWOGA in Benin, Africa.

4. It was further part of the conspiracy that, while living with defendant NAWOMI AWOGA in Benin, defendant AWOGA coached Victim A and Victim B to make false representations to U.S. Custom Officials regarding their family relationships and status for the purposes of obtaining a visitor visa to enter the United States. Specifically, among other false statements, Victim A and Victim B were directed by defendant AWOGA to identify co-conspirator A and co-conspirator B as their parents and to state that they were sisters.

5. It was further part of the conspiracy that, on or about September 9, 2014, defendant AWOGA caused the U.S. government to issue Victim A and Victim B a classification B1/B2 visa to enter the United States. The visas were valid for six months upon entry into the United States.

6. It was further part of the conspiracy that the visas were issued under the false names provided to Victim A and Victim B by co-conspirator A, co-conspirator B, and AWOGA.

7. It was further part of the conspiracy that, on or about September 24, 2014, Victim A and Victim B traveled to the United States with defendant AWOGA, co-conspirator A and co-conspirator B. Pursuant to their visas, Victim A and Victim B were required to leave the United States by March 23, 2015. After that date, Victim A and Victim B were no longer allowed to legally remain in the United States.

8. It was further part of the conspiracy that, after arriving in the United States, Victim A and Victim B lived with defendant MARINA OKE and her family at Residence A, located in the Northern District of Illinois.

9. It was further part of the conspiracy that in or around November 2014, Victim B was moved from defendant MARINA OKE's home to live with defendant ASSIBA LEA FANDOHAN and her family at Residence B, located in the Northern District of Illinois.

10. It was further part of the conspiracy that between August 2017 and October 2018, after becoming aware of the investigation, defendants took steps to

prevent law enforcement from locating Victim A, to include shuttling Victim A among homes of third parties.

11. Beginning no later than in or around June 2014, and continuing until at least in or around October 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

NAWOMI AWOGA, MARINA OKE a.k.a. Marina Fandohan, and
ASSIBA LEA FANDOHAN,

defendants herein, did conspire with each other and others known and unknown to the Grand Jury to conceal, harbor, and shield from detection Victim A and Victim B, in Residences A and B, who the defendants knew and recklessly disregarded the fact that the aliens had come to, entered, and remained in the United States in violation of the law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii);

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

COUNT TWO

The SPECIAL MAY 2019 GRAND JURY further charges:

1. The allegations in paragraphs 1, and 3 through 8 of Count One of this indictment are incorporated here.

2. Beginning in or around March 24, 2015, and continuing through on or about August 9, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARINA OKE, a.k.a. Marina Fandohan,

defendant herein, for the purpose of private financial gain and for commercial advantage, concealed, harbored and shielded from detection Victim A, at Residence A, Country Club Hills, Illinois, and at Business A, Homewood, Illinois, knowing and in reckless disregard of the fact that the alien had come to, entered, or remained in the United States in violation of law;

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

COUNT THREE

The SPECIAL MAY 2019 GRAND JURY further charges:

1. The allegations in paragraphs 1, 3 through 7, and 9, of Count One of this indictment are incorporated here.

2. Beginning in or around March 24, 2015, and continuing through on or about September 6, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

ASSIBA LEA FANDOHAN, and
NAWOMI AWOGA

defendants herein, for the purpose of private financial gain and for commercial advantage, concealed, harbored and shielded from detection Victim B, at Residence B, Hazel Crest, Illinois, knowing and in reckless disregard of the fact that the alien had come to, entered, or remained in the United States in violation of law;

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i) and Title 18, United States Code, Section 2.

COUNT FOUR

The SPECIAL MAY 2019 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.

2. Beginning in or around September 2014, and continuing through in or about August 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARINA OKE, a.k.a Marina Fandohan, defendant herein, knowingly obtained the labor and services of a person, namely Victim A, by means of: (a) serious harm and threats of serious harm to Victim A or another person; and (b) a scheme, plan, and pattern intended to cause Victim A to believe that, if Victim A did not perform such labor and services, Victim A or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(1), (a)(4) and (d).

COUNT FIVE

The SPECIAL MAY 2019 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.
2. Beginning in or around October 2014, and continuing through on or about September 6, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

ASSIBA LEA FANDOHAN and
NAWOMI AWOGA

defendants herein, knowingly obtained the labor and services of a person, namely Victim B, by means of: (a) serious harm and threats of serious harm to Victim B or another person; and (b) a scheme, plan, and pattern intended to cause Victim B to believe that, if Victim B did not perform such labor and services, Victim B or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(1), (a)(4) and (d), and 2.

FORFEITURE ALLEGATION

The SPECIAL MAY 2019 GRAND JURY further alleges:

Upon conviction of an offense in violation of Title 8, United States Code, Sections 1324(a), as set forth in this indictment, defendants shall forfeit to the United States of America the gross proceeds of such violation, and any property traceable to such conveyance or proceeds, as provided in Title 18, United States Code, Sections 982(a)(6)(A) and Title 8, United States Code, Section 1324(b)(1).

A TRUE BILL:

FOREPERSON

_____ signed by Timothy J. Storino on behalf of the
UNITED STATES ATTORNEY